

**LAURA CURRAN**  
County Executive



**JARED A. KASSCHAU**  
County Attorney

**COUNTY OF NASSAU  
OFFICE OF THE COUNTY ATTORNEY**

February 19, 2021

**Via ECF**

Hon. Roanne L. Mann  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Curry v. Nassau County First Precinct Baldwin, et al.  
CV-18-1130 (KAM) (RLM)

Dear Judge Mann:

This office represents the Defendants in the above-referenced action. We write, with the consent of Plaintiff, to advise the court whether a settlement conference might be productive, propose a schedule of further proceedings and request an extension of time to produce discovery to Plaintiff.

The Defendants regret that this letter was not submitted by February 8, 2021, as was previously directed by the Court. The undersigned was on an emergency leave from January 28, 2021 to February 16, 2021 and is currently out of the office self-quarantining pursuant to New York State travel protocols until February 23, 2021. As a result, the undersigned handling attorney on this matter does not currently have access to the complete file in this case. In addition, the undersigned was unable to serve Plaintiff with responses to his First Request for Document Production and Interrogatories by February 1, 2021 or meet the February 8, 2021 deadline to confer with Plaintiff and submit a letter to the Court. We certainly regret any inconvenience to the Court.

The undersigned has since conferred with Plaintiff, who states that a settlement conference would be productive. However, given the expansive difference in the parties' settlement positions, the Defendants do not believe that a settlement conference would be productive at this time. The parties have agreed to the following proposed schedule for further proceedings:

- Defendants' Response to Plaintiff's Discovery Requests on or before February 26, 2021.
- Plaintiff shall submit expert witness report(s) on or before April 16, 2021;
- Defendants shall submit expert witness report(s) on or before May 31, 2021;
- Deposition of experts witnesses on or before June 30, 2021; and

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- Complete the first step in the dispositive motion process on or before August 3, 2021.

Thank you for your time and consideration in this matter.

Respectfully submitted,  
/s/  
Jennean R. Rogers  
Deputy County Attorney

cc: Ernest Curry (Via First-Class Mail)